Subject: Evaluation of the Closure Documentation for CAR 10-026 from Audit A-10-14, Los Alamos National Laboratory Central Characterization Project Activities


Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Report (CAR) 10-026 closure documentation submitted in the above-referenced letter.

The results of the evaluation are documented on the enclosed CAR Continuation Sheet, which indicates acceptance of the submitted closure documentation. Please be advised that CBFO CAR 10-026 is considered closed.

If you have any questions or comments, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure
A. Holland, CBFO
M Navarrete, CBFO
N Castaneda, CBFO
D. Gadbury, CBFO
D. Haar, WTS/CCP
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T. Peake, EPA
M. Eagle, EPA
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R. Joglekar, EPA
S. Ghose, EPA
R. Lee, EPA
S. Zappe, NMED
S. Holmes, NMED
T. Kesterson, DOE OB WIPP NMED
D. Winters, DNFSB
P. Gilbert, LANL-CO
G. Lyshik, LANL-CO
A. Pangle, CTAC
G. White, CTAC
T. Putnam, CTAC
WIPP Operating Record
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
### Block # 9 Condition Adverse to Quality (CAQ):

There is no objective evidence that TRUPACT-II part number 2077-180-24 (ICV seal test port plug seal O-ring) was replaced, as required, when the corresponding seal test port plug (2077-156-07) was replaced on TRUPACT-II #176 on Job #09-049. (This is not a containment boundary item.)

### Block # 17 Acceptance of Corrective Action Completion:

An evaluation was performed of the completion of corrective actions related to CBFO Corrective Action Report (CAR) 10-026. The notification of completion of corrective actions was submitted via letter CP:10:01415, dated June 30, 2010, from D. K. Ploetz, Central Characterization Project Manager, to Mr. D. S. Miehls, Senior Quality Assurance Specialist, Carlsbad Field Office. The letter contained the following attachments:

- (Action 1) Maintenance Records for Job #09-049, Annotated with Reference to CBFO CAR 10-026
- (Action 2) Briefing on the Procedural Requirements for Performing Maintenance to Ensure Compliance with Work Instruction CH.01, Attendance Roster for the Briefing on Procedural Requirements, and E-Mail Used as the Basis for the Briefing on Procedural Requirements
- (Action 3) CCP Standing Order CCP-S0-063, Revision Original

### Remedial Actions:

The completed Maintenance Record form for Job #09-049 supports the conclusion that the O-ring was not replaced when work was performed in October 2009. There are blocks on the form in which to place the peel-off labels from the bags containing the plug and the O-ring (or to write in the information, if there are no peel-off labels). For Job #09-049, the completed Maintenance Record form has the peel-off label for the plug, but the block where the O-ring information should have been entered is marked N/A.

CCP will take the following remedial action in response to the CAR condition:

- CCP will add a note to complete Maintenance Record form for Job #09-049 referencing CBFO CAR 10-026, so that it is clear that the problem has been identified and addressed.

Closure documentation (Action 1) included a copy of the annotation and was reviewed to ensure closure of Remedial Actions.

### Actions To Preclude Recurrence

Item a) CCP sent an e-mail to all MLU Team members, stating the procedural requirements for performing maintenance to ensure compliance with DOE/WIPP 02-3183, Rev. 6, Attachment B, Work Instruction CH.01, Revision 2 (completed 5/21/10). CCP will follow up with a briefing that addresses and reinforces the above requirements and submit a copy of the attendance roster upon closure.

- (Action 2) Briefing on the Procedural Requirements for Performing Maintenance to Ensure Compliance with Work Instruction CH.01, Attendance Roster for the Briefing on Procedural Requirements, and E-Mail used as the Basis for the Briefing on Procedural Requirements

Documentation of Action 2 was reviewed and found to be acceptable.

Item b) CCP will direct that operators take a copy of any applicable Work Instruction(s) with them when performing maintenance in the field. This direction will be documented in a CCP standing Order that will remain in effect until a permanent location is identified for the requirement. Submit a copy of the standing order upon closure.
CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 10-026
2. Activity No: A-10-14
3. Page 2 of 2

- (Action 3) CCP Standing Order CCP-SO-063, Revision Original

Documentation of Action 3 was reviewed and found to be acceptable.

The corrective actions for the condition adverse to quality described in the CBFO CAR 10-026 are determined to be complete and it is recommended that the CAR be closed.

Completion of Corrective Actions Evaluated By: Thomas Putnam

July 6, 2010